

Comments on RM-11306  
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I have been a licensed Amateur Radio Operator for over 55 years and a holder of the Commercial Radio Telephone and Commercial Radio Telegraph First Class Licenses.

I have been active in Amateur Radio since 1948, having been Class B, Class A, Advanced and Amateur Extra Class. I am a Life Member of the ARRL.

I speak on my own behalf and that of three Radio Clubs in which I am President or an Officer representing approximately 100 Licensed Radio Amateurs.

I urge the FCC to dismiss this ARRL proposal as unsuitable and deleterious for the Amateur Radio Service. The proposed change would be very difficult for the FCC and Radio Amateurs to police. The addition of automatic forwarding remotely controlled digital transmitters in the Amateur Radio Service HF spectrum would create interference world-wide and violate the long standing requirement to avoid interference with communications already in progress on a frequency. The operator remotely controlling a distant transmitter has no way to know he is causing interference with communications already in progress.

The ARRL ignores the FCC Part 97 allocation for SSB from 7075-7100 for the Insular Areas of the USA (Hawaii, Alaska, Puerto Rico, US Virgin Islands, American Samoa, Guam, Northern Marianas et al) which was directed by act of CONGRESS. The ARRL Proposal would violate the Congressional direction from which this Sub-Band was provided and remove the required Sub-Band for SSB below 7100 kHz. The extreme interference caused by digital automatic forwarding systems may be found now within this SSB Sub-Band. This demonstrates the lack of ARRL understanding of the damage caused by their recommendations for automatic digital frequencies.

There is no basis for increasing the allocation of frequencies for wide modulation modes used by very few radio amateurs. Those who enjoy operating AM have adequate frequencies under the existing Part 97 Rules.

I urge the FCC to make one change to the existing Part 97 Rules which is recommended in the comments on RM-11306 by CQ Magazine, and that is to limit all transmissions in the 30 meter band, 10.100 to 10.150 MHz to less

than 500 Hz. This would eliminate those currently skirting the existing rules by utilizing digital PHONE in the 30 meter band. This would accept part of the ARRL proposal for 30 meters but with only the narrow 500 Hz bandwidth.

The ARRL proposal would favor Win-Link and automatic station control over the existing, and long standing, rules which give priority to communications in progress. There is NO reason to favor digital modes used by a few amateurs over other modes in the Amateur Radio Service.

The FCC experience with the Citizens Radio Service should NOT be repeated in the Amateur Radio Service. Nor should the FCC experience with "Incentive Licensing" as requested by the ARRL be repeated. The ARRL does NOT speak for Amateur Radio. Their membership is a small fraction of the Licensed Amateur Radio Operators. The proposals in RM-11306 would serve the advertisers interested in selling the required digital mode hardware and software rather than the Amateur Radio Service.

I urge the FCC to reject the changes proposed in RM-11306. Only the correction of the rules for CW only in the 30 meter band is required. No benefit to the Amateur Radio Service would result from adoption of this proposal.

/Signed John D. Peters K1ER